



## Mecklenburg County Health Department

January 30, 2000

To: Wendy Krupowicz

From: Dennis Salmen

Re: Food preparation by children in day cares

Wendy:

The question raised at our meeting on January 27<sup>th</sup> as to whether children can prepare food in a day care as part of their learning experience, and then consume such foods, is not addressed specifically by any interpretive memos I have from the Children's Environmental Health Branch, DENR. However, I'd like to reference 3 sections in the Sanitation rules.

1. **Section .2805 Food Protection, paragraph (a)** states:

"Food shall be protected at all times from contamination including dust, insects, rodents, unclean equipment and utensils, unnecessary handling, coughs and sneezes, flooding...."

Children preparing food for consumption (by them) is **unnecessary handling and coughs and sneezes by such are not controllable.**

2. **Section .2807 Food Preparation, paragraph(a)** states:

"Food shall be prepared with the least possible manual contact, with appropriate utensils, and on surfaces that have been cleaned, rinsed, and sanitized prior to use in order to prevent cross-contamination".

Children preparing food for consumption (by them) is not maintaining the "least possible manual contact".

3. **Section .2823 Personnel, paragraph(a-e)** addresses various facets of sanitary employee practices such as trimmed fingernails, hair restraints, etc. Paragraph(e) states that volunteers are held to the same standards and, in the case of children participation in food preparation, they are 'volunteers'. Compliance with all the rules in this section by children would be difficult.

**Based on the above, this Department would prohibit the practice of children preparing foods which they intend to consume.** The Children's Environmental Health Branch may address this issue in the future which could provide further or updated clarification. The recommended practice to allow child participation in 'play cooking' settings, if consumption is desired, would be to either have the kitchen staff prepare the same product and subtly substitute for it or purchase the product already prepared and substitute.

**North Carolina Department of  
Environment And Natural Resources**

**Division of Environmental Health**

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
Terry Pierce, Director  
Bart Campbell, Section Chief



December 21, 2004

**MEMORANDUM**

**TO:** Dennis Salmen, RS, Environmental Program Manager  
Mecklenburg County Health Department

**FROM:** Larry D. Michael, RS, MPH, Field Supervisor  
Children's Environmental Health Branch

**THROUGH:** Ed Norman, MPH, Program Supervisor  
Children's Environmental Health Branch

**SUBJECT:** Children Preparing Food in Licensed Child Care Centers

The purpose of this memo is to review the Mecklenburg County Health Department's policy (attached) in regard to children preparing food in licensed child care centers and the proposed modification to this activity.

The Children's Environmental Health Branch (CEHB) concurs with your interpretation--children are prohibited from preparing food for other children. In addition, the CEHB agrees with the modification that you have described that would allow children to prepare and consume food for themselves only.

In considering the question about whether children could prepare food for other children, the concern is not only potentially hazardous food products, but also the potential for contamination of food during preparation and service. Fecal-oral transmission of organisms with low infective-dose rates (e.g., *Shigella*, Hepatitis A Virus) are particularly of concern. Improper handling of raw and cooked fruits and vegetables and other foods provide a favorable environment for outbreaks to occur.

If you need additional information or if you have any questions about this memo please contact me at (919) 449-0759 or email [Larry.Michael@ncmail.net](mailto:Larry.Michael@ncmail.net).

cc: EH Listserv  
LHD Listserv

Larry:

I have had the local school system (CMS) approach us about a pilot GRANT program which will result in CHILDREN (ages 6-11) preparing food to be consumed by them, in After School Enrichment Program (ASEP) settings which are all licensed child cares. We have historically prohibited this concept altogether based on the attached interpretation memo sent to the local Division of Child Development (DCD) supervisor, Wendy Krupowicz, back in 2000. DCD, incidentally, was in agreement with us back in 2000 on this. I'd like to ask you to review one of the 23 curriculum menus attached where you'll note that children, in groups, cut up, handle, mix, etc. foods, then consume it at end. I advised CMS that I'm not aware of any current State Policy on this and that I would forward to CEHB for your review. I also advised them that CEHB could make the interpretation that either our local policy is incorrect and that this should be permissible OR that our reasoning is sound and that, as proposed, these type of activities are not permissible.

That being said, I brainstormed w/ CMS staff on how they could modify the exercise to not violate our interpretation. For example, in the attached exercise, somebody said that each STUDENT could have their own disposable bowl or cup, their own sliced apples, their own mixing utensil, etc., prepare per the curriculum, and taste their own product. Other than the issues w/ handwashing, open heating/cooking (FIRE CODE Concerns), and where the food is opened/cutup/stored (e.g. in cafeteria), this could be analogous to what happens when each student brings their own lunch on a full teacher workday and opens, mixes, eats, etc. their food, enmass....which is OK. The ASEP Program is hoping for a quick resolution on this (less than a month). Also, this same GRANT program is getting fired up in 16 other counties, some of whom are bound to be school systems. These school systems may also have licensed child cares. FINAL NOTE- This sample curriculum is pretty minor in the prep component. Some of the other curriculums I viewed have much more intensive prep steps which make doing it by each child, even if approved conditionally, improbable.

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